

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS MOTION IN
LIMINE NO. 16**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal information in its September 16, 2017 Motion *in Limine* No. 16 and exhibits thereto (the
8 “Administrative Motion” or “Waymo’s Motion”), as well as Defendants’ response and exhibits
9 thereto. The Administrative Motion seeks an order sealing the following materials:

| Document | Portions to Be Filed Under Seal | Designating Party |
|--|---------------------------------|-------------------|
| Exhibit A to Waymo’s Motion | Portions highlighted in red | Waymo |
| Exhibit F to Waymo’s Motion | Portions highlighted in red | Waymo |
| Portions of Otto Trucking’s Opposition to Waymo’s Motion in Limine No. 16 (“Otto Trucking’s Opposition”) | Portions highlighted in green | Waymo |
| Exhibit 5 to Otto Trucking’s Opposition | Portions in green | Waymo |
| Exhibit 6 to Otto Trucking’s Opposition | Portions in green | Waymo |
| Exhibit 7 to Otto Trucking’s Opposition | Portion in green | Waymo |

20 3. The Court should seal the portions of Waymo’s Exhibits A, F, portions of Otto
21 Trucking’s Opposition, and Otto Trucking Exhibits 5-7 because they contain or refers to Waymo’s
22 asserted trade secrets, which Waymo seeks to seal. I understand that this information is maintained as
23 secret by Waymo (Dkt. 25-47) and is valuable as trade secret to Waymo’s business (Dkt. 25-31). The
24 public disclosure of this information would give Waymo’s competitors access to in-depth
25 descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle system. The
26 public disclosure of this information would give Waymo’s competitors access to Waymo’s own in-
27 depth analysis of its business, and if such information were made public, I understand that Waymo’s
28

1 competitive standing would be significantly harmed. Waymo's request to seal is narrowly tailored to
2 only the confidential information.

3
4 I declare under penalty of perjury under the laws of the State of California that the foregoing is
5 true and correct, and that this declaration was executed in San Francisco, California, on September 13,
6 2017.

7 By /s/ Lindsay Cooper

8 Lindsay Cooper

9 Attorneys for WAYMO LLC
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven